

EXHIBIT 69

M. Parrott

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

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ELIZABETH SINES, et al.,

Plaintiffs,

Civil Action No.

v.

3:17-cv-00072-NKM

JASON KESSLER, et al.,

Defendants.

-----X

** REVISED **

VIDEOCONFERENCE DEPOSITION OF

MATTHEW DAVID PARROTT

Paoli, Kentucky

Friday, June 26, 2020

Reported by:

DEBORAH C. FUREY, RPR, CLR, CRI

JOB NO. 180624

M. Parrott

June 26, 2020

9:37 a.m.

Videoconference and videotaped Deposition
of MATTHEW DAVID PARROTT, appearing remotely, before
Deborah C. Furey, a Registered Professional Reporter,
Certified LiveNote Reporter, and Notary Public of the
states of Ohio and Kentucky.

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2 A. Yes.

3 Q. And, at that point, isn't it true that
4 Michael Tubbs led a charge through the
5 counterprotestors?

6 A. Yes.

7 Q. And you stated, at that point, that the
8 League fighters with shields put their training to
9 work, correct?

10 A. Yes.

11 Q. And what training are you referring to
12 there?

13 A. I'm referring to basic blocking tactics,
14 lining up a shield wall and pushing through,
15 pushing through opposition.

16 Q. Okay. What's a "shield wall"?

17 A. A "shield wall" is when the shields are
18 lined up to stop any projectiles or fists or
19 anything else getting through to harm any of our
20 members.

21 Q. And is it also true that the shield
22 walls are used to break through groups of
23 counterprotestors?

24 A. Yes.

25 Q. And you describe your people getting

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2 incident --

3 Q. At some point, at some -- sorry.

4 At some point you became aware that a
5 man named DeAndre [Redacted for PII] was beaten badly in the
6 garage, is that correct?

7 A. That is correct.

8 Q. And you were also aware that Daniel
9 [Redacted for PII] had no injuries, isn't that true?

10 A. That is correct.

11 Q. Daniel [Redacted for PII] was arrested for what he
12 did at Charlottesville, right?

13 A. Yes.

14 Q. And, ultimately, he was convicted,
15 right?

16 A. Yes.

17 Q. Did you reach out to Mr. [Redacted for PII] to
18 support him while he was facing charges?

19 A. Yes. It is my fiduciary obligation to
20 support members who become legally entangled on
21 account of our events.

22 Q. I'm sorry. A fiduciary obligation
23 towards TWP members?

24 A. Yes.

25 Q. So you reached out to Mr. [Redacted for PII]

M. Parrott

C E R T I F I C A T E

STATE OF KENTUCKY,)
) SS:
COUNTY OF CAMPBELL.)

I, Deborah C. Furey, a Notary Public within and for the State of Kentucky, duly commissioned and qualified, do hereby certify that the foregoing witness was first duly sworn to testify the truth, the whole truth, and nothing but the truth; that the testimony given by the witness was reduced to writing by me by means of stenotype; that I subsequently transcribed my stenographic notes with the aid of a computer, out of the presence of the witness; that the foregoing is a true and correct transcript of my said stenographic notes; that I am not a relative, attorney, or counsel of any party or otherwise financially interested in the events of this action; nor is the court reporting firm with which I am affiliated under a contract as defined in Civil Rule 28(D).

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal of office this 29th day of June, 2020.

Deborah Furey

Deborah C. Furey, RPR
Notary Public in and for the
State of Kentucky 9-10-22